

## REMARKS

In response to the Examiner's Office Action of March 24, 2006, Applicants are herein presenting their considerations and response to the Examiner's comments. The Examiner has indicated that Figure 2 should be designated by a legend such as "Prior Art". Figure 2 has been amended accordingly.

Referring to the specification and claim objections, the specification has been amended at Page 8 to read "BRIEF DESCRIPTION OF THE DRAWINGS", as suggested by the Examiner. Moreover, Claims 4 and 12 have been amended to remove multiple dependencies. New Claims 14-17 merely replicate the subject matter originally claimed in Claims 12-13, and therefore do not change the substance of the claims or add new matter. Applicant submits that the specification and drawings are now in order and all formalities objections have been overcome.

Referring to the substantive objections, Examiner contends that Claims 1 to 3, 5 to 8, and 10 to 13 are anticipated by *Fong et al.* (US 2004/0064456). Applicants would traverse this consideration.

The claimed invention defines a method and system which preferably avoids the use of a join operation when extracting data from a database. This process is explained generally at Page 12 beginning Line 4 and ending Line 16.

As can be seen from the description at Page 12 and each of the independent claims, the claimed invention avoids the use of a join operation by creating an additional entity (such as a table) which contains aggregate data which is representative of a plurality of entities in the database. In

the embodiment described, this teaches the form of table which forms part of the original database.

*Fong*, in contrast does not create an additional table in an existing database, to facilitate the search and subsequent return of comprehensive information on each entity. Rather, *Fong* is concerned with taking information contained in various different databases, and aggregating this information into one database schema.

That is, whilst *Fong* refers to the "aggregation" of data, data is not aggregated in the same manner or for the same purpose as the claimed invention of Applicants.

In the cited *Fong* reference, Examiner refers generally to *Fong's* Figure 1, Figure 4 and Figure 5. However, Figure 4 of *Fong* in particular, discloses a database where two different databases, namely Schema A and Schema B are brought together into a single new database "Schema X". As can be seen from Figure 4 in particular, Schema A contains original attributes A1, A2 and A3, whereas Schema B contains (across two classes) attributes A2 and A3. This is then "aggregated" into a new database structure by determining that there is an overlap between Schema A and Schema B of attributes A2 and A3 and producing a new database with attributes A1, A2 and A3.

The new schema of *Fong* merely replicates the same data structure that would conventionally be used in any relational database. Therefore, a user, using the invention taught in *Fong et al.*, would still be required to perform a join operation to bring attributes A1, A2 and A3 into a single table. Therefore, the invention of *Fong* cannot and does not save searching time by placing all aggregated data into a single entity.

The claimed invention of Applicants, in contrast, is not concerned with migrating various different databases

into a single database, but rather, is concerned with collecting data that would normally be spread across a number of entities in a database, and placing such data into a newly created entity in an aggregated form, to eliminate the need to perform a join operation when a user wishes to view the aggregated data. Each of the independent claims has been amended to more clearly describe this concept.

Therefore, Applicant's claims, as a whole are novel and non-obvious, as the claimed invention clearly distinguishes over *Fong et al.*

Moreover, as the independent claims are clearly novel and inventive over *Fong et al.*, it is believed that the Examiner's objection to Claims 4, 5, and 9 is traversed as the features of Claim 4, 5 and 9 are not disclosed, even when *Fong* is combined with *Prabhakaran*.

*Prabhakaran* involves stress testing of database storage and works to generate Read/Write commands to some "desired" ratio of reads to writes.

However, note Applicants' page 14 line 20, onward through page 15, where "performance is maximized" when the Read/Write ratio is greater than a certain critical amount termed the "critical Read/Write Ratio".

No such teaching is to be found in the *Prabhakaran* reference --- and there is no suggestion in *Fong* that implies the desirability of including such a technique --- as would be legally required in the cases of *In re Mills*, 16 USPQ2d, 1430 (Fed.Cir.1990); and *In re Fine*, 5 USPQ2d, 1596-99 (Fed.Cir.1988).

As a result, it is respectfully requested that Examiner consider Applicants' claims as a whole in their entirety and subsequently provide a timely Notice of Allowance.

Respectfully submitted,

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Date June 13, 2006

Patti S. Freddy

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**IN THE DRAWINGS:**

Please replace Figures 2, 3 and 4 currently on file with attached page of new Figures 2, 3 and 4 enclosed herein.